

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ALABAMA
EASTERN DIVISION**

LATONYA CHAMES,)	
)	
Plaintiff,)	
)	
v.)	Case No.: 1:21-CV-1571-CLM
)	
SHERIFF MATTHEW WADE,)	
)	
Defendant.)	

**DEFENDANT’S NOTICE REGARDING PLAINTIFF’S
NON-COMPLIANCE WITH PRETRIAL DEADLINES**

Defendant, Sheriff Matthew Wade, submits this Notice to inform the Court of Plaintiff’s continuing non-compliance with the Court’s Amended Scheduling Order (Doc. 49) as the final pretrial deadlines expire.

1. Pursuant to the Court’s Amended Scheduling Order entered November 14, 2024 (Doc. 49), the following pretrial deadlines were established:

- June 6, 2025 — Witness and Exhibit Lists due.
- June 13, 2025 — Objections and Motions in Limine due.
- June 20, 2025 — Responses to Objections and Motions in Limine due.

2. Defendant timely filed his Witness List (Docs. 65 & 66), Exhibit List (Doc. 67), and Omnibus Motion in Limine (Doc. 68).

3. As of the date of this filing, Plaintiff has filed:

- No witness list.
- No exhibit list.
- No objections to Defendant's disclosures.
- No motions in limine.
- No response to Defendant's Motions in Limine.

4. The Court's Amended Scheduling Order expressly provides that "**no deadlines will be extended moving forward**" (Doc. 49 at 1).

5. Today's date, June 20, 2025, marks the final pretrial deadline for responses to objections and motions in limine. Plaintiff has submitted no objections or responsive filings, leaving Defendant without notice of any evidentiary disputes that might arise at trial or any opportunity to address such disputes in advance. Plaintiff has neither acknowledged these missed deadlines nor sought any extension of time to comply, thereby compounding the prejudice to Defendant's ability to prepare for trial.

6. Plaintiff's continued failure to comply materially prejudices Defendant's ability to prepare for trial, including the inability to identify Plaintiff's intended witnesses, exhibits, or legal theories, and the inability to prepare Defendant's own witnesses in advance regarding the admissibility or scope of their anticipated testimony. Plaintiff's failure to identify witnesses and exhibits not only

prejudices Defendant's ability to prepare for trial, but also impairs the Court's ability to conduct an orderly pretrial conference and manage the presentation of evidence at trial.

Defendant reserves all rights to request appropriate relief at the pretrial conference, including exclusion of any witnesses, exhibits, or arguments not properly disclosed in compliance with the Court's Orders.

Respectfully submitted this the 20th day of June, 2025.

/s/ C. Richard Hill, Jr.

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CERTIFICATE OF SERVICE

I hereby certify that on this 20th day of June 2025, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to all counsel of record (and by U.S. Mail to non-CM/ECF participants) as indicated below:

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/s/ C. Richard Hill, Jr.

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